

# State of California



## Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance  
(916) 322-5662

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322-5660

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• • Enforcement • •  
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• • Statements of Economic Interest  
322-6444

March 5, 1985

Michael A. Bojanowski  
Planning Commissioner  
17477 Ter Holland Lane  
Healdsburg, CA 94558

Re: Your Request for Advice  
Our File No. A-85-019

Dear Mr. Bojanowski:

Judy Carlson of our staff referred to me your question regarding reporting obligations on a Statement of Economic Interests.

You are a developer, and you own more than 10 percent of a development company. You have asked whether you must disclose the names of individual buyers on Schedule H-1.

If an official owns a 10 percent or greater interest in a business entity, the official must disclose an individual or entity's name if the official's pro rata share of the payments from that individual or entity was \$10,000 or more during the reporting period. Government Code Sections 82030 and 87207(b)(2). Thus, you would report the name of each individual buyer if the payment met the threshold described above.

You also asked whether the answer would be the same if the project were very large, for example, if it were over 100 homes? You would still report the names of the individual buyers. If you are not directly involved with the sales transactions on the homes, you may not be aware of each of the individual purchasers; the Political Reform Act requires you to disclose those buyers of whom you know or have reason to know.

It is my understanding that you may need to amend Schedule H-1 of your 1983 Annual Statement of Economic Interests. The enclosed supplemental forms are provided for that purpose. The completed supplemental forms should be filed

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with your clerk who will retain a copy and forward the originals to the Fair Political Practices Commission.

I hope this has clarified the disclosure provisions for you. If I can be of additional help please feel free to contact me at (916) 322-5662.

Sincerely,

Jeanette E. Turvill  
Legal Assistant

JET:plh  
Enclosures

# Memorandum

To : Barbara

Date : January 31, 1985

From : **FAIR POLITICAL PRACTICES COMMISSION**  
Judy C.

Subject: Statements of Economic Interests

I spoke today with a County Planning Commissioner, Michael A. Bojanowski, regarding filing a Supplemental Schedule H to his 1983 Annual Statement of Economic Interests. During our conversation he asked me the following question:

If a developer builds and sells a large number of homes and the pro-rata share of each sale, either to himself as a sole owner, or to a business entity in which he has a 10% or greater interest, is \$10,000 or more, does he have to report the name of each individual buyer on Schedule H-1? What would happen if the project was very large, say over 100 homes?

You can write to Mr. Bojanowski at:

17577 Ter Holland Lane  
Healdsburg, CA 94558

Thank you.